

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS – HOUSTON DIVISION**

COUVILLION GROUP, LLC

VERSUS

**WHITE MARLIN OPERATING
COMPANY LLC et al.**

*
*
*
*
*
*
*
*
*
*

CIVIL ACTION NO. 4:22-cv-00908

* * * * *

**UNOPPOSED MOTION FOR EXTENSION OF BRIEFING SCHEDULE
DEADLINES**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Couvillion Group, LLC (“Couvillion”), who respectfully submits this Unopposed Motion for Extension of Briefing Schedule Deadlines. Couvillion respectfully requests that the briefing schedule deadlines set following the Court’s Pre-Motion Conference with the parties be extended by forty-five (45) days. Defendants White Marlin Operating Company, LLC (“White Marlin”), Agua Tranquillo Midstream LLC (“Agua”), and Talco Petroleum, LLC (“Talco,” and collectively with White Marlin and Agua, “Defendants”), do not oppose this relief.

On June 7, 2022, Defendants filed a Request for Pre-Motion Conference, in which Defendants requested that the Court schedule a pre-motion conference prior to Defendants filing a Motion to Dismiss Couvillion’s Verified First Amended

Complaint (“Complaint”), Record Doc. No. 11, under Rules 9 and 12 of the Federal Rules of Civil Procedure. Record Doc. No. 15. On June 8, 2022, the Court scheduled this pre-motion conference for June 10, 2022, at 9:45 a.m. Record Doc. No. 17.

On June 10, 2022, counsel for Couvillion and counsel for Defendants appeared at the pre-motion conference, and on behalf of Couvillion, counsel requested time to amend Couvillion’s Complaint prior to Defendants filing a Motion to Dismiss. The Court granted this request, and set the following briefing schedule:

- July 8, 2022: Amended Complaint Due
- July 29, 2022: Motion to Dismiss the Amended Complaint Due
- August 19, 2022: Response to Motion to Dismiss the Amended Complaint Due
- August 26, 2022: Reply to Response to Motion to Dismiss the Amended Complaint Due

In the interim, Couvillion and Defendants have been working to determine whether an amicable resolution of this matter may be reached without further pleading and/or motion practice. If a resolution is not reached during the requested extended period, Couvillion intends to amend its Complaint to assert additional causes of action against Defendants as well as other, related entities. While Couvillion is working with Defendants to determine if an amicable resolution may be reached without further pleading and/or motion practice, Couvillion requires additional time to amend its Complaint. Accordingly, Couvillion respectfully requests that the deadlines set forth in the above briefing schedule be extended

by forty-five (45) days. As set forth above, Defendants are not opposed to this requested extension.

WHEREFORE, Couvillion Group, LLC respectfully requests that the deadlines set forth in the Court's briefing schedule be extended by forty-five (45) days to permit the parties to continue to work towards an amicable resolution.

[remainder of page intentionally left blank]

Respectfully submitted,

FRILOT L.L.C.

/s/ Colton V. Acosta

PATRICK J. MCSHANE T.A. (#19055)

Pro hac vice

DANICA BENBOW DENNY (#27376)

Pro hac vice

KATHLEEN P. RICE (#31291)

Pro hac vice

COLTON V. ACOSTA (#38121)

Pro hac vice

1100 Poydras Street, Suite 3700

New Orleans, LA 70163-3600

Telephone: (504) 599-8000

Facsimile: (504) 599-8100

E-mail: pmcshane@frilot.com

ddenny@frilot.com

krice@frilot.com

cacosta@frilot.com

***Counsel for Plaintiff, Couvillion Group,
LLC***

AND

RICHARD GORMAN LAW

/s/ Richard L. Gorman

Richard L. Gorman

State Bar No. 00784155

Federal I.D. 15685

12335 Kingsride Ln. #354

Houston, TX 77024-4116

Telephone: (832) 725-4026

Facsimile: (281) 854-2200

E-mail:

rg@richardgormanlaw.com

***Local Counsel for Plaintiff, Couvillion
Group, LLC***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of July, 2022, the foregoing was filed electronically with the Clerk of Court by using the CM/ECF system. Notice of this filing will be sent to all parties who participate in electronic filing by operation of the court's electronic filing system.

/s/ Colton V. Acosta

Colton V. Acosta